

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	Case No.: 2:06-cr-89-WKW-CSC
)	
FREEMAN STEVENSON, JR.)	

**MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE
TO PERMIT DEFENDANT TO ATTEND GRANDMOTHER'S FUNERAL**

COMES NOW the Defendant, Freeman Stevenson, Jr., by and through undersigned counsel, Anne E. Borelli, and files this Motion to Modify Conditions of Pretrial Release. In support of this Motion, Defendant would show the following:

1. On April 27, 2006, Freeman Stevenson, Jr., was placed on pretrial release.
2. As a condition of his release, Mr. Stevenson was placed on electronic monitoring.
3. Since being placed on pretrial release, Mr. Stevenson has complied with all of the conditions of his release.
4. Mr. Stevenson's grandmother passed away on September 12, 2006, in Cleveland, Ohio.
5. Mr. Stevenson requests the Court's permission to attend his grandmother's funeral, set for Thursday, September 21, 2006, at 1:00 p.m. in Cleveland.
6. The funeral will be held at Gaines' Funeral Home; 9116 Union Ave.; Cleveland, Ohio.

7. Mr. Stevenson will be staying with his aunt, Milnice Harris at 2654 E. 122nd St.; Cleveland, Ohio. Ms. Harris' telephone number is 216-795-3877.
8. Mr. Stevenson will be driving to Cleveland with members of his family. The trip is expected to take at least twelve hours on the road.
9. Mr. Stevenson requests permission to leave Montgomery on Tuesday, September 19, 2006, at midnight and return on Saturday, September 23, 2006, by noon.
10. The United States Probation Office, through Senior USPO Bernard Ross, has no opposition to this requested modification.

WHEREFORE, based on the foregoing, Mr. Stevenson respectfully requests that this requested modification be granted.

Dated this 18th day of September 2006.

Respectfully submitted,

s/ Anne E. Borelli
ANNE E. BORELLI
Counsel for Freeman Stevenson
Federal Defenders
201 Monroe Street, Suite 407
Montgomery, Alabama 36104
Phone: (334) 834-2099
Fax: (334) 834-0353
E-mail: anne_borelli@fd.org
AL Bar Code:

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Chris Snyder, Esq., Assistant U. S. Attorney, One Court Square, Suite 201, Montgomery, Alabama 36104.

Respectfully submitted,

s/ Anne E. Borelli
ANNE E. BORELLI
Counsel for Freeman Stevenson
Federal Defenders
201 Monroe Street, Suite 407
Montgomery, Alabama 36104
Phone: (334) 834-2099
Fax: (334) 834-0353
E-mail: anne_borelli@fd.org
AL Bar Code: BOR-016